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Attorneys for Plaintiff and Counterdefendant UM
CORPORATION and Counterdefendants GOLDEN
MEDIA GROUP, INC. and TIGA
ENTERTAINMENT COMPANY, LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UM CORPORATION, a Japanese
corporation,

Plaintiff,

v.

TSUBURAYA PRODUCTIONS CO.,
LTD., a Japanese corporation,

Defendant.

AND RELATED CROSS-CLAIMS

Case No. 2:15-cv-03764-AB (AJWx)

**DECLARATION OF JEFFREY D.
WEXLER IN SUPPORT OF
PLAINTIFF AND
COUNTERDEFENDANT UM
CORPORATION'S MOTION FOR
JUDGMENT ON THE PLEADINGS
[Fed. R. Civ. P. 12(c)] OR, IN THE
ALTERNATIVE, FOR SUMMARY
JUDGMENT [Fed. R. Civ. P. 56]**

Date: September 12, 2016
Time: 10:00 a.m.
Location: Courtroom 4

Motion Hrng. Cutoff: January 9, 2017
Pretrial Conf.: March 27, 2017
Trial: April 18, 2017

DECLARATION OF JEFFREY D. WEXLER

I, Jeffrey D. Wexler, declare:

1. I am an attorney licensed to practice law in the State of California and am a member of the bar of this Court. I am senior counsel at the law firm of Pillsbury Winthrop Shaw Pittman LLP, attorneys of record for plaintiff and counterdefendant UM Corporation (“UMC”) and counterdefendants Golden Media Group, Inc. and TIGA Entertainment Company, Ltd. in this action. Unless indicated otherwise, I have personal knowledge of the following facts, and if called as a witness I could and would testify competently to those facts.

2. Attached hereto as Exhibit A is a true and correct copy of a document entitled “License Granting Agreement” and dated March 4, 1976, as produced by defendant and counterclaimant Tsuburaya Productions Co., Ltd. (“TPC”) on or about March 11, 2016 bearing the document control numbers TP0001003, followed by another, more legible copy of the same Agreement, as produced by UMC on or about March 17, 2016 bearing the document control number UMC000476.

3. Attached hereto as Exhibit B is a true and correct copy of an unofficial English translation of a November 14, 2007 Judgment of the Supreme Court of Thailand, Case No. 7457/2550. (UMC is providing the Court with this unofficial translation for the Court’s information, but UMC is not asking the Court to take judicial notice of the translation and does not vouch for the accuracy of the translation, which is not certified.)

4. Attached hereto as Exhibit C is a true and correct copy of a letter dated July 10, 2014 from Shinichi Ooka of TPC to Perasit Saengduenchai of UMC, as produced by TPC on or about March 11, 2016 bearing the document control number TP00001107.

5. Attached hereto as Exhibit D is a true and correct copy of a letter dated July 10, 2014 from Shinichi Ooka of TPC to Sompote Saengduenchai, as

1 produced by TPC on or about March 11, 2016 bearing the document control
2 number TP00001171.

3 6. Attached hereto as Exhibits E and F, respectively, are true and correct
4 copies of: (a) a written statement from Hideaki Tsuburaya, the former president of
5 TPC, dated February 26, 2013 and filed with a court in China in connection with
6 the legal proceedings there; and (b) an English translation of that written statement.
7 These documents were produced by UMC on or about March 17, 2016 bearing the
8 document control numbers UMC0000024-32 and UMC0000033-35, respectively.
9 (UMC submits these exhibits to demonstrate the existence of a genuine issue of
10 fact that would preclude a *sua sponte* grant of summary judgment against UMC
11 based on the November 14, 2007 Judgment of the Supreme Court of Thailand, but
12 does not seek summary judgment based upon such exhibits.)

13 I declare under penalty of perjury under the laws of the United States of
14 America that the foregoing is true and correct.

15 Executed this 25th day of July, 2016, at Los Angeles, California.

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17 /s/ Jeffrey D. Wexler
Jeffrey D. Wexler
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